



HOME SHOPPING NETWORK, INC.

EX PARTE OR LATE FILED

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June 28, 1993

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Chairman James Quello  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

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JUN 29 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Implementation of Rate Regulation Sections of the Cable Television  
Consumer Protection and Competition Act of 1992;  
MM Docket No. 92-266  
WRITTEN EX PARTE PRESENTATION

Dear Chairman Quello:

Home Shopping Network, Inc. (HSN) submits this letter in support of the Petition for Reconsideration recently filed by Booth American Company and twelve other cable operators (the "Booth Petition") regarding the Commission's rate regulations. HSN understands that the deadline for filing in this proceeding was June 21, 1993, and respectfully requests that the Commission treat this letter as an informal filing in that proceeding.

HSN has not taken a public position to date on the rate provisions of the 1992 Cable Act and might not feel a direct negative impact from these rules. However, HSN is concerned about the harm that these rules are likely to do to HSN's affiliated cable operators. Accordingly, HSN's daily contact with cable operators of all sizes has led it to conclude that the Commission should revisit these rules with an eye towards creating a less confusing, burdensome and dampening regulatory structure.

In HSN's view, the Commission's rate regulations impose a crushing regulatory burden on cable operators attempting to comply in good faith with the rules. HSN, while not a cable operator, appreciates the frustration that operators feel when faced with these imposing regulatory directives. HSN believes that the regulations proposed by the Commission fail to take into account the complexity of running the modern cable system and the complicated environment in which it operates.

In addition, HSN believes that the Commission's rules, by failing so far to have specific standards for cost-of service proceedings, are unfair to cable operators. Operators simply do not know the standards by which they will be judged by their franchising authorities or the Commission. In addition to due process concerns, HSN believes that all parties struggling to cope with these rules are entitled to more guidance from the Commission.

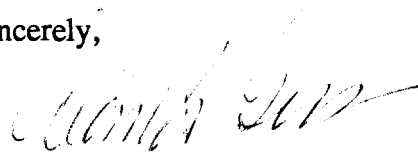
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For the reasons stated above, HSN strongly encourages the Commission to take this opportunity to revisit and revise its rules.

In accordance with Section 1.1206(a)(1) of the Commission's rules, two copies have been delivered under separate cover to the Acting Secretary of the Commission, William Caton.

Sincerely,



Alan H. Gerson